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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

MARTIN DEFENSE GROUP, LLC,
AND NAVATEK HOLDINGS LLC

Plaintiffs,

v.

MARTIN KAO; TIFFANY JENNIFER LAM a.k.a. JENNY LAM and/or TIFFANY KAO; LAWRENCE KAHELE LUM KEE; CLIFFORD CHEN; GARY AMBROSE; DUKE HARTMAN; SOCIETY OF YOUNG WOMEN SCIENTISTS AND ENGINEERS LLC,

Defendants.

Case 1:22-cv-00283-LEK-WRP

DEFENDANTS MARTIN KAO, TIFFANY JENNIFER LAM aka JENNY LAM and/or TIFFANY KAO, AND SOCIETY OF YOUNG WOMEN SCIENTISTS AND ENGINEERS, LLC'S INITIAL DISCLOSURES

DEFENDANTS MARTIN KAO, TIFFANY JENNIFER LAM aka JENNY LAM and/or TIFFANY KAO, AND SOCIETY OF YOUNG WOMEN SCIENTISTS AND ENGINEERS, LLC'S INITIAL DISCLOSURES

COME NOW DEFENDANTS MARTIN KAO, TIFFANY JENNIFER LAM aka JENNY LAM and/or TIFFANY KAO, AND SOCIETY OF YOUNG WOMEN SCIENTISTS AND ENGINEERS, LLC ("Defendants"), through counsel, and pursuant to Rule 26(a)(1), Federal Rules of Civil Procedure, hereby provide their Initial Disclosures:

DISCLOSURES

These initial disclosures may be supplemented by later disclosure, discovery, correspondence, and pleadings. Defendants do not waive their right to object to the production of documents or the testimony of any witnesses, on any ground, including (1) the attorney-client privilege or the work-product doctrine; (2) relevance, competence or materiality; (3) over-breadth, undue burden or oppression; (4) any privilege against self-incrimination.

I. Persons with discoverable information that may support defenses

Nothing herein shall be construed as a waiver of the privilege against self-incrimination as set forth the Fifth Amendment of the United States Constitution, Article I, Section 10 of the Hawai'i Constitution and Hawai'i Rule of Evidence 509 (hereinafter "Privilege against Self-Incrimination"). Nothing herein shall be

construed as a waiver of defenses, including but not limited to defenses based on res judicata, arbitration and award, and jurisdiction.

Subject to the foregoing and other qualification set forth in this disclosure, Defendants respond as follows:

A. Martin Kao
c/o CHOI & ITO
CHUCK C. CHOI
ALLISON A. ITO
700 Bishop Street, Suite 1107
Honolulu, Hawaii 96813
Telephone No. (808) 533-1877

Witness has information relevant to facts but will assert his Privilege against Self-Incrimination.

B. Tiffany Lam
c/o CHOI & ITO
CHUCK C. CHOI
ALLISON A. ITO
700 Bishop Street, Suite 1107
Honolulu, Hawaii 96813
Telephone No. (808) 533-1877

Witness has information relevant to facts but will assert her Privilege against Self-Incrimination.

C. LAWRENCE KAHELE LUM KEE.
SCOTT E. KUBOTA 3706-0
NEALK. AOKI 3919-0
4 Waterfront Plaza, Suite 480
500 Ala Moana Boulevard
Honolulu, Hawaii 96813

Telephone No.: (808) 532-9595
Facsimile No.: (808) 532-9599

Witness is believed to have relevant information.

D. CLIFFORD CHEN
Contact information not currently known.

Witness is believed to have relevant information.

E. GARY AMBROSE
Contact information not currently known.

Witness is believed to have relevant information.

F. DUKE HARTMAN
c/o MARGERY S. BRONSTER
REX Y. FUJICHIKU
BRONSTER FUJICHIKU ROBBINS
A Law Corporation
1003 Bishop Street, Suite 2300
Honolulu, Hawai‘i 96813
Telephone: (808) 524-5644
Facsimile: (808) 599-1881

Witness is believed to have relevant information.

G. Past and Current employees of MDG
Including but not limited to:
Pam Berry
Daniel Brunk
Eric Schiff
Michael Schmicker
James Ota
c/o LUNG ROSE VOSS & WAGNILD
Topa Financial Center

700 Bishop Street, Suite 900
Honolulu, Hawaii 96813
Telephone: (808) 523-9000
Facsimile: (808) 533-4184

Witnesses are believed to have relevant information.

H. Past and current representatives of Navatek Holdings LLC
c/o LUNG ROSE VOSS & WAGNILD
Topa Financial Center
700 Bishop Street, Suite 900
Honolulu, Hawaii 96813
Telephone: (808) 523-9000
Facsimile: (808) 533-4184

Witnesses are believed to have relevant information.

I. Steven Loui
c/o Kobayashi Sugita & Goda, LLP
David M. Louie, Esq.
Jesse W. Schiel, Esq.
Nicholas R. Monlux, Esq.
Ryan D. Louie, Esq.
999 Bishop Street, Suite 2600
Honolulu, Hawaii 96813

Witness is believed to have relevant information.

J. Michael O'Malley
c/o Michael Heihre
1000 Bishop Street, Suite 1200
Honolulu, Hawai'i 96813-4212
Direct Line: (808) 521-9231
Direct Fax: (808) 540-5009

Witness is believed to have relevant information.

II. Documents

Nothing herein shall be construed as a waiver of the privilege against self-incrimination as set forth the Fifth Amendment of the United States Constitution, Article I, Section 10 of the Hawai'i Constitution and Hawai'i Rule of Evidence 509 (hereinafter "Privilege against Self-Incrimination"). Nothing herein shall be construed as a waiver of defenses, including but not limited to defenses based on res judicata, arbitration and award, and jurisdiction. Nothing herein shall be construed as an admission that certain types of documents exist and are possessed by Defendants. Nothing herein shall be construed as a waiver of claims of attorney-client privilege.

Subject to the foregoing and other qualification set forth in this disclosure, Defendants respond that the following categories of documents may support their defenses: arbitration award; correspondence, including emails; attachments to emails; business records. It is believed that most documents are in the possession of Plaintiffs.

III. Damages

Defendants have not asserted claims for damages.

IV. Insurance

Defendants are not aware of any insurance policy.

DATED: Honolulu, Hawaii, September 5, 2022.

/s/ Chuck C. Choi

KEITH M. KIUCHI
CHUCK C. CHOI
ALLISON A. ITO
MICHEL A. OKAZAKI
ATTORNEYS FOR DEFENDANTS
MARTIN KAO, TIFFANY LAM AND
SOCIETY OF YOUNG WOMEN SCIENTISTS
AND ENGINEERS